

UNITED STATES DISTRICT COURT

for the
District of New Mexico

United States of America

v.

Robert Ray PEREA
YOB 1983Case No. **23mj794***Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 4 and October 18, 2022 in the county of Bernalillo in the
District of New Mexico, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. Sections 2114

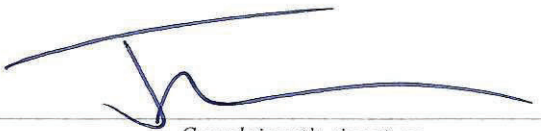
Robbery of a Postal Employee

18 U.S.C. Sections 924(c)(1)(A)(i)
(ii)

Brandishing a Firearm During and in Relation to a Crime of Violence.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.*Complainant's signature*

Jean-Lucien Souvenir, U.S. Postal Inspector

Printed name and title

Telephonically sworn and electronically signed.

Date: 05/04/2023*Judge's signature*City and state: Albuquerque, New Mexico

Hon. Steven C. Yarbrough, U.S. Postal Inspector

Printed name and title

AFFIDAVIT FOR CRIMINAL COMPLAINT

I, Jean-Lucien Souvenir, having been duly sworn, do depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector and have been so employed since November 2019. I am assigned to the Phoenix Division, Albuquerque Domicile, Albuquerque, New Mexico. One of my responsibilities is to investigate violent crimes involving United States Postal Service (USPS) employees. I have been trained to work on numerous federal criminal investigations. Prior to my appointment as a U.S. Postal Inspector, I served as a Criminal Investigator with the United States Marshals Service in El Paso and San Antonio, Texas, for nine (9) years. I hold a bachelor's degree in psychology from Florida International University in Miami, FL. During my career as a federal law enforcement officer, I have participated in financial crimes, robberies, burglaries, and drug trafficking investigations.

2. This Affidavit is made for the limited purpose of establishing probable cause that Ray PEREA (PEREA) committed the following criminal offenses: Title 18, United States Code, Section 2114: Robbery of a Postal Employee; and Title 18, United States Code, Section 924(c)(1)(A)(i)(ii): Brandishing a Firearm During and in Relation to and in furtherance of a Crime of Violence.

3. My knowledge of the facts alleged in this Affidavit arises from my training and experience, my personal observations, my participation in the investigation described below, information developed by law enforcement agents, my discussions with witnesses, and my review of documents and video. This Affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

DETAILS OF INVESTIGATION

ARMED ROBBERY OF LETTER CARRIER AT 11401 Key West DR. NE
(ROBBERY 1)

4. On October 4, 2022, at approximately 3:40 PM, Inspectors were notified of an armed robbery of a USPS letter carrier at 11401 Key West Dr. NE 87111 in Albuquerque, NM (hereafter "Robbery 1"). The incident occurred at approximately 2:57 PM. Postal Inspectors from the Albuquerque Domicile responded immediately.

5. I interviewed the victim, USPS Letter Carrier G.V., who stated he/she was delivering mail at 11401 Key West Dr. NE, Albuquerque, NM 87111 when a black Nissan Sedan (no license plate) parked behind his/her USPS Mail Truck. G.V. delivered the mail and was returning to his/her truck when an unknown Hispanic male (approximately 5'7" and wearing a hat, dark top, dark bottom, and a facial mask) exited the black Nissan sedan, brandished a weapon, and demanded G.V.'s USPS keys and cell phone. G.V. described the weapon as a silver semi-automatic pistol. G.V. threw the USPS scanner and the USPS mail vehicle keys on the ground. The suspect insisted G.V. give his/her personal cell phone as well. G.V. complied with the suspect's demands. The suspect fled the scene with G.V.'s cell phone, USPS Scanner, and USPS mail vehicle keys. G.V. was not harmed. The USPS Arrow/ Modified Arrow Lock (MAL) keys were not taken during this robbery because G.V. only gave the suspect his/her vehicle keys.

6. Inspectors obtained surveillance footage from a near-by address, which confirmed G.V.'s account of the incident and revealed the male suspect did not act alone but was assisted by at least one additional suspect. The other suspect(s) drove what appeared to be a gray/olive green sedan (unknown license plates). Both vehicles were seen on surveillance footage entering the scene of the robbery together and fleeing the neighborhood together at a high rate of speed.

7. Inspectors later found G.V.'s iPhone and scanner at 11212 Baja Drive NE, Albuquerque NM 87111, which was near the scene of Robbery 1.

**ARMED ROBBERY OF LETTER CARRIER AT 9001 PAN AMERICAN FWY. NE
(ROBBERY 2)**

8. On October 18, 2022, at approximately 1:30 PM, Inspectors were notified of another robbery of a USPS letter carrier near the intersection of Pan American Fwy. NE and Eagle Rock Ave. NE, Albuquerque, New Mexico 87113 (hereafter "Robbery 2"). The incident occurred at approximately 12:45 PM. Postal Inspectors from the Albuquerque Domicile responded immediately.

9. Inspectors Kelly McNulty and Corina Castro interviewed the victim, USPS Letter Carrier F.W., who stated he/she was delivering mail at 9001 Pan American Fwy. NE, Albuquerque, New Mexico 87113. F.W. was returning to his/her USPS mail vehicle on Eagle Rock Ave. when a gray four-door Toyota vehicle pulled up near the USPS mail vehicle. F.W. stated the vehicle was headed eastbound on Eagle Rock Ave. NE when it approached. F.W. stated an unknown Hispanic male exited the vehicle and was holding a piece of mail in his right hand, waving at F.W. F.W. assumed the individual was trying to give him/her the piece of mail to be sent out. When F.W. approached the suspect, the suspect handed the letter to F.W., but then told F.W. the driver of the vehicle had a gun and demanded F.W. give him the "keys." F.W. complied, unclipped the USPS keys from his/her belt loop and gave the suspect two USPS keys, which included one (1) USPS Arrow key and one (1) Modified Arrow Lock (MAL) key.

10. F.W. stated the suspect took the USPS mail keys only. F.W. stated no weapon was brandished but the suspect stated the driver had a gun. F.W. was not harmed and did not see the driver of the vehicle, however, F.W. stated he/she saw a Toyota symbol on the back of the vehicle as the vehicle drove away. F.W. described the suspect as approximately 5'7"- 5'8", medium build,

weighing approximately 175lbs, and mid-20s. F.W. stated the suspect had a scruffy beard/facial hair. The suspect was wearing a gray beanie and sunglasses.

11. Several surveillance videos were obtained from the area of Robbery 2. Footage from Bilt-Wel Buildings, located at 9001 Pan American Fwy NE, confirmed F.W.'s account of the incident and depicted F.W.'s encounter with the suspect and the vehicle. In the surveillance video footage, the vehicle appears to be a gray/olive green sedan, similar to the second vehicle used in Robbery 1.

REPORTS OF MAIL THEFT IN ZIP CODE 87113

12. The Arrow/MAL keys stolen during Robbery 2 will open all USPS mailboxes in the 87113-zip code. On October 19, 2022, U.S. Postal Inspectors were notified by the USPS North Valley Carrier Annex that several Neighborhood Delivery Collection Box Units (NDCBUs) within the 87113-zip code appeared to have a large amount of mail missing. On October 26, 2022, a USPS customer contacted Postal Inspectors and reported that her mail was stolen repeatedly for the past week.

13. On October 19, 2022, the USPIS received a mail theft complaint from the Olympus Alameda Apartments located at 6301 Alameda Blvd NE, Albuquerque, NM 87113. The complaint was regarding the apartment complex NDCBU, which was found opened, mail was missing, and some mail pieces were scattered on the ground.

14. Video footage from the area showed what appeared to be two (2) male suspects using a USPS key to open the NDCBU and removing large amounts of mail between 4:45 AM and 4:50 AM. The suspects departed the area leaving the NDCBU's open. The suspects were seen departing in a black Nissan sedan, which matches the description of the sedan used in Robbery 1.

15. On November 9, 2022, Inspectors were notified by the Sun North Estates, Homeowners Association (HOA) secretary that two (2) NDCBUs were found opened and

appeared to have a large amount of mail missing. The first NDCBU is located at 8450 Creek Street Albuquerque, NM 87113. At approximately 5:00 AM, the HOA secretary watched the mail theft incident via a live feed from her cell phone. The secretary stated the perpetrators appeared to be two males operating a black vehicle with no license plate. The second address affected in the Sun North Estates neighborhood was the NDCBU located near 8305 Brook Street Albuquerque, NM 87113. Both NDCBUs were found opened and mail was missing, and some mail pieces were scattered on the ground.

16. On November 8, 2022, Postal Inspectors released a reward poster on Facebook, Albuquerque Crime Stoppers, and local news networks regarding Robberies 1 and 2. The release included still photos obtained from the video surveillance from the Olympus Apartments that depicted what appeared to be the two male suspects. One of the male individuals in the surveillance video is wearing a black hoodie and black pants and carrying a black backpack.

IDENTIFICATION AND INTERVIEW OF RAY PEREA

17. Through investigative means, including the receipt of tip to law enforcement, Robert Ray Perea (PEREA) was identified as the male suspect in Robbery 1 and the individual wearing a black hoodie in the reward poster.

18. On April 20, 2023, Inspector C. Castro and I interviewed PEREA. PEREA was detained at the Metropolitan Detention Center (MDC) in Albuquerque, NM on unrelated state charges. Prior to interviewing PEREA, we identified ourselves by showing PEREA our agency badges and credentials. I also made it clear to PEREA that we were not here to talk about his current state charges but wanted to talk about the two (2) robberies involving letter carriers described above. PEREA was read his Miranda Rights which he stated he understood, and he agreed to speak with us.

19. During the interview, PEREA admitted to being present at Robbery 2 but initially denied any involvement in Robbery 1. Regarding Robbery 2, PEREA stated that he “was there” with another female suspect. He stated that he and the female drove around looking for a mail carrier. He also stated that he got “two or three keys” from the letter carrier during Robbery 2.

20. After initially denying any involvement in Robbery 1, PEREA eventually admitted he was present. PEREA stated he used a small .22 caliber silver pistol and that the mail carrier was “hysterical,” which is consistent with G.V.’s account. He also stated that the gun was not loaded and did not work. PEREA also stated that two other individuals were present at Robbery 2, one of which remained in the vehicle armed with an assault rifle.

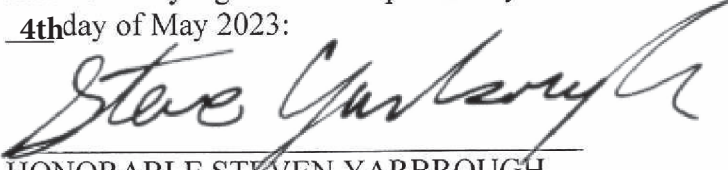
21. PEREA was also shown reward posters from both robberies and the mail thefts. He admitted that he was the man featured in both. However, he refused to write his initials next to his photograph.

CONCLUSION

22. Based on the above information, I submit there is probable cause to believe Robert Ray PEREA committed violations of Title 18, U.S.C., Sections 2114 on or about October 4 and 18, 2022: Robbery of a Postal Employee; and Title 18, U.S.C., Sections 924(c)(1)(A)(i)(ii): Brandishing a Firearm During and in Relation to a Crime of Violence.


Jean-Lucien Souvenir
United States Postal Inspector

Electronically signed and telephonically sworn on this
4th day of May 2023:


HONORABLE STEVEN YARBROUGH
UNITED STATES MAGISTRATE JUDGE